

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

REJI SAMUEL, ATHA MOHAMMAD ABDUL,)
KESAVARAO BUNDANKAYALA, RAJU DIVAKARAN,)
BIJU PERUMPILLY GEORGE, KRISHNA GONTHINA,)
NAYAPPULLI JAYACHANDRAN, GALLA VENKATA)
RAMA KRISHNA, SAMUEL JOSE KUMRUMTHODATHIL,)
LOHITHAKSHAN MADAMPET, JOHNY MANDY MATHAI,)
BELTHAZAR PETER, MOHANAN BALAKRISHNA PILLAI,)
SANTHOSH KUMAR RAJENDRAN PILLAI, ABY)
KARICKATHARA RAJU, SUMESH)
PORAMBATHUPARAMBIL SUBRAMANIAN, and)
CHANDRAN SHAJU THANISSERY,)

Plaintiffs,

v.

SIGNAL INTERNATIONAL L.L.C., SIGNAL)
INTERNATIONAL, INC., SIGNAL INTERNATIONAL)
TEXAS, G.P., SIGNAL INTERNATIONAL TEXAS, L.P.,)
MALVERN C. BURNETT, GULF COAST IMMIGRATION)
LAW CENTER, L.L.C., LAW OFFICES OF MALVERN C.)
BURNETT, A.P.C., GLOBAL RESOURCES, INC., MICHAEL)
POL, SACHIN DEWAN, and DEWAN CONSULTANTS PVT.)
LTD. (a/k/a MEDTECH CONSULTANTS),)

Defendants.

CIVIL ACTION NO.:
1:13-cv-00323-MAC-ZJH

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY
IN OPPOSITION TO MOTION OF SIGNAL DEFENDANTS
FOR PARTIAL SUMMARY JUDGMENT**

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Plaintiffs respectfully file this notice submitting for consideration in connection with their Response in Opposition to Motion of Signal Defendants for Partial Summary Judgment [ECF No. 187] (the “Response”) – which, together with the Signal Defendants’¹ related motion [ECF No. 165] (the “Motion”), is currently pending before the Court – the attached recent decisions from the related *David* case. See Order, *David v. Signal Int’l, LLC*, No. 2:08-cv-01220-SM-DEK (E.D. La. Jan. 6, 2015), ECF No. 2077 (the “TVPRA Order”) attached as Exhibit 1; Order, *David v. Signal Int’l, LLC*, No. 2:08-cv-01220-SM-DEK (E.D. La. Jan. 9, 2015), ECF No. 2115 attached as Exhibit 2 (the “RICO Order”, and together with the TVPRA Order, the “Orders”).

Plaintiffs submit the Orders for the Court’s consideration because they are directly relevant to the Motion and the Response and correctly articulate the reasons, discussed in greater detail in the Response and Plaintiffs’ related sur-reply [ECF No. 209], why Signal’s Motion lacks basis in law and should be denied.

DATED: January 20, 2015.

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Respectfully Submitted,

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¹ As used herein, “Signal Defendants” refers collectively to Signal International, L.L.C., Signal International, Inc., Signal International Texas, G.P., and Signal International Texas, L.P.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 20, 2015, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

I FURTHER CERTIFY that U.S. Mail sent to the address of record for Global Resources, Inc. has been returned undeliverable, therefore I am unable to serve a copy of these pleadings on Global Resources, Inc. The last known address of Global Resources, Inc. is:

Global Resources, Inc.
c/o Michael Pol
13 Herring Road
Beaumont, MS 39423-2055

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